

**DEFENDANTS' WITNESS LIST PURSUANT TO
COURT'S AMENDED SCHEDULING ORDER**

Defendants, Jetson Electric Bikes, LLC and Walmart Inc. (hereinafter "Defendants"), by and through the undersigned counsel, and pursuant to the Court's Amended Order Setting Case for Jury Trial hereby file their Witness List as follows:

Defendants reserve the right to supplement, update, or make substitutions to this list as the need may arise or as additional witnesses are identified in ongoing investigation and discovery.

1. Defendants hereby reincorporate their Initial Rule 26(a)(1) Disclosures filed on November 1, 2023, and all witnesses set forth therein.

2. Defendants hereby reincorporate their Expert Witness Disclosures filed on September 13, 2024, any amendments thereto, and all rebuttal experts allowable by this Court.

3. Plaintiffs' treating physicians at Memorial Hospital of Sweetwater County, 1200 College Dr. Rock Springs, WY 82901. Memorial Hospital agents, employees, and other medical personnel have knowledge of the injuries and damages Plaintiffs sustained as a result of this incident. Medical personnel include but are not limited to Julianne Forrester, FNP-C, Astrid Haaland, and Mary Murphy, M.D.

4. Plaintiffs' treating physicians at University of Utah Hospitals and Clinics / Burn Center – 50 North Medical Drive, Suite AA24, Salt Lake City, UT 84132. Utah Hospitals agents, employees, and other medical personnel have knowledge of the injuries and damages Plaintiffs sustained as a result of this incident. Medical personnel include but are not limited to Christopher LaChappelle, MD, Callie Thompson, MD, Brianne Schiffer, MD, Giavonni Lewis, MD, Ashraf

Patel, MD, Westley Hunsaker, PA-C, Mindy Orr, APRN, Matthew Curtis, MD, David Souza, PA-C, and/or Daphne Perry, PT.

5. Plaintiffs' treating physicians at Castle Rock Medical Center – 1400 Uinta Dr., Green River, WY 82935. Castle Rock agents, employees, and other medical personnel have knowledge of the injuries and damages Plaintiffs sustained as a result of this incident. Medical personnel include but are not limited to Lynn Eskelson, MD, Joel Robertson, MD, Kristine F. Sherwin, PA-C, and/or Brenna Kirsch, APRN.

6. Plaintiffs' treating physicians at High Plains Physical Therapy – 920 Upland Way, Green River, WY 82935. High Plains agents, employees, and other medical personnel have knowledge of the injuries and damages Plaintiffs sustained as a result of this incident. Medical personnel include but are not limited to Michael Nelson, PT.

7. Plaintiffs' treating physicians at Rock Springs Plastic Surgery Center – 1180 College Dr. Suite 3-3, Rock Springs, WY 82901. Rock Springs agents, employees, and other medical personnel have knowledge of the injuries and damages Plaintiffs sustained as a result of this incident. Medical personnel include but are not limited to Scott Sulentich, MD and/or Ashley Tarasen, MD.

8. Plaintiffs' treating providers at Castle Rock Hospital District – Emergency Services – 1400 Uinta Dr., Green River, WY 82935. Castle Rock - Emergency Services agents, employees, and other medical personnel have knowledge of the injuries and damages Plaintiffs sustained as a result of this incident. Medical personnel include but are not limited to Chelcee Serres, EMT, and/or Heather Graebert, EMT.

9. Plaintiffs' treating providers at Desert View Eyecare, LLC – 170 Commerce Dr., #C, Green River, WY 82935. Desert View agents, employees, and other medical personnel have

knowledge of the injuries and damages Plaintiffs sustained as a result of this incident. Medical personnel include but are not limited to Jeffrey Wilson, OD, and/or Amasa Mecham, OD.

10. Any and all Sweetwater County Sheriff's Department agents, employees, and/or personnel who responded, provided aid, and/or investigated the incident subject to this litigation.

11. Any and all Green River Fire Department agents, employees, and/or personnel who responded, provided aid, and/or investigated the incident subject to this litigation.

12. Any and all Sweetwater County Fire Department agents, employees, and/or personnel who responded, provided aid, and/or investigated the incident subject to this litigation.

13. Any and all Green River Police Department agents, employees, and/or personnel who responded, provided aid, and/or investigated the incident subject to this litigation.

14. Any and all Sweetwater County School District agents, employees, and/or personnel who taught, assisted, or provided help and/or aid to the Plaintiffs as a result of the incident subject to this litigation.

15. Any and all witnesses, expert or otherwise, of the Plaintiffs.

16. Any and all witnesses listed in any answers to interrogatories or mentioned in documents produced pursuant to requests for production or notices of production from non-parties.

17. Any and all witnesses deposed or noticed for deposition.

18. Any and all persons named or identified in any and all hospital documents, records, or notes that provided treatment or care to the Plaintiffs.

19. Any and all consultants, investigators, and/or other persons retained by any other party for purposes relating to this lawsuit.

20. Any and all health care providers and/or health professionals who rendered care to Plaintiffs relating to the underlying incident.

21. These Defendants reserve the right to supplement this Witness List with additional witnesses as discovery / disclosures proceed.

22. These Defendants reserve the right to amend or modify this Witness List should additional witnesses be identified hereafter, as allowed by the Court.

McCOY LEAVITT LASKEY LLC

Attorneys for Defendants, Jetson Electric Bikes,
LLC and Walmart Inc.

Dated: October 3, 2024

By: 

Eugene M. LaFlamme (*pro hac vice*)
Jared B. Giroux (*pro hac vice*)
Jillian L. Lukens (*pro hac vice*)
McCoy Leavitt Laskey, LLC
N19 W24200 Riverwood Drive, Suite 125
Waukesha, WI 53188
(P) 262-522-7000
elaflamme@MLLlaw.com
jgiroux@MLLlaw.com
jlukens@MLLlaw.com

and

Timothy M. Stubson, Wyo. Bar No. 6-3144
Brandon E. Pryde, Wyo. Bar No. 8-6883
Holly L. Tysse, Wyo. Bar No. 7-5553
Crowley Fleck, PLLP
111 West 2nd Street, Suite 220
Casper, WY 82601
(P) 307-232-6901
tstubson@crowleyfleck.com
bpryde@crowleyfleck.com
htysse@crowleyfleck.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 3, 2024, a true and correct copy of the foregoing was electronically served to all counsel of record.



EUGENE M. LaFLAMME, Esq.